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7 *Las Vegas Metropolitan Police Department,*
Vanessa Mitchell, and Don'te Mitchell

8
9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 MARY SMITH, individually, and as Special
Administrator of the Estate of JAMES PEREA,

12 Plaintiffs,

13 vs.

14 LAS VEGAS METROPOLITAN POLICE
DEPARTMENT; WELLPATH, LLC; RN
15 RACHEL CLARK; RN TANJA
WASIELEWSKI; RN GENEVA BESSIE;
16 LCSW SANDRA CELIS; MA/LNA MELEKA
ST. JOHN. RN STEPHANIE ESTALA; NP
17 HUGH ANDREW ROSSET; NP SHELLEY
AMEDURI; PA ANDREA BALOGH; RN
18 AYNUR KABOTA; CORRECTIONS
OFFICER VENESSA MITCHELL;
19 CORRECTIONS OFFICER DON'TE
MITCHELL; CORRECTIONS OFFICER
20 JOSHUA WALDMAN; DOES 1-30,

21 Defendants.

Case No.: 2:23-cv-00092-JAD-NJK

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR LVMPD
DEFENDANTS TO FILE REPLIES IN
SUPPORT OF THE MOTIONS FOR
SUMMARY JUDGMENT (Third Request)
[ECF Nos. 143, 144]**

22 Pursuant to Local Rule 6-1, Mary Smith, individually and as Special Administrator of the
23 Estate of James Perea ("Plaintiffs"), Las Vegas Metropolitan Police Department, Vanessa
24 Mitchell, and Don'te Mitchell ("LVMPD Defendants"), stipulate, agree, and request that the Court

1 extend the deadline for LVMPD Defendants to file their Replies in support of the pending Motions
 2 for Summary Judgment, (ECF Nos. 143, 144), from the current date of June 30, 2025, for an
 3 additional 1 day, to Tuesday, July 1, 2025.¹ The parties agree that good cause supports the minimal
 4 extension of the briefing schedule based on counsel for LVMPD Defendants experiencing
 5 technology issues on the current due date which is preventing them from being able to complete
 6 their Replies for filing, and in order to thoroughly address all issues raised in Plaintiffs' Responses.
 7 The brief extension will not prejudice any parties.

8 DATED this 30th day of June, 2025.

DATED this 30th day of June, 2025.

9 By: /s/ Kristopher J. Kalkowski
 10 Lyssa S. Anderson (SBN 5781)
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By: /s/ Peter Goldstein
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Attorney for Plaintiffs

14 **IT IS SO ORDERED.**

15 DATED this 2nd day of July, 2025.

17 
 UNITED STATES DISTRICT JUDGE

22 _____
 23 ¹ Wellpath, LLC, Rachel Clark, Tanja Wasielewski, Geneva Bessie, Sandra Celis, Meleka St.
 24 John, Stephanie Estala, Hugh Andrew Rosset, Shelley Ameduri, and Andrea Balogh ("Wellpath
 Defendants") are not included in this Stipulation because the bankruptcy stay has only been lifted
 as to LVMPD Defendants and Plaintiffs. *See* (Order, ECF No. 140).